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PATENT

REMARKS

Claims 13-16 are pending. Claims 1-12 were previously cancelled. Claims 15-16 have been allowed.

No new subject matter has been added to the application.

Claims 13-14 were rejected under 35 U.S.C. §102(b) in view of Stern. This rejection is respectfully traversed as follows.

In order to sustain a §102 rejection of independent claim 13, each and every feature of the claim must be taught by the reference. Currently amended claim 13 distinguishes from Stern as argued below.

- (1) Pending claim 13 recites a method that includes the step (a) of applying ink "*with a noncontact inkjet printing head*". For support see Figure 1 and page 20, lines 32 et seq. The inkjet head applies ink to the substrate by spraying the ink. No direct contact occurs between the substrate and the ink applicators (e.g. the ink jet nozzles). In contrast to claim 13, Stern in Figure 1 and col. 5, lines 49-52 discloses the application of ink to a substrate via an inking roller 22, whereby ink is transferred to the substrate 14 when the substrate passes between rollers 22 and 24.
- (2) Claim 13 recites applying ink to the substrate in step (a) along a first substantially straight portion. Applicants agree that Stern discloses the application of ink from inking roller 22 as the web is fed from a substantially straight first portion as illustrated in Stern Figure 1.

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(3) Claim 13 recites in step (b) that (after ink application) the substrate is transported along a *first convex curve while actively drying the substrate*. In Stern, the *first active drying occurs along the second convex curve of roller 26*. The first convex curve along the transport path in Stern occurs when the web 12 changes direction around roller 24 and no active drying is shown (see Figure 1).

(4) Claim 13 recites transporting the substrate in step (c) along a second substantially straight portion. This occurs *after* the first active drying step along the first convex curve of step (b). In Stern the *second substantially straight portion is positioned between roller 24 and roller 26 prior to the first instance of actively drying the substrate along the second convex curve of roller 26* (Figure 1). In other words, the second straight portion of Stern does not occur after the first active drying along the first curve section as recited in pending claim 13.

Independent claim 13, and claim 14 dependent thereon, contains features as argued above that are not disclosed or described in Stern. Applicants thus aver that claims 13-14 are allowable over Stern.

In determining a prima facie case for obviousness under 35 U.S.C. §103, it is necessary to show that the combination of prior art teachings is proper, and that those teachings are sufficient to suggest making the claimed modifications to one of ordinary skill in the art. Applicants aver that there is no suggestion or motivation in Stern for those skilled in the art to combine Stern with other references in an attempt to yield the present invention.

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The prior art made of record and not relied upon has been reviewed but is not considered material to the patentability of the invention.

Attached is a Revocation of Power of Attorney with New Power of Attorney and Change of Correspondence Address.

No fees are believed to be due with this response. However, if an error has been made in the fee calculations, please charge any excess fees due and credit any overpayment to Deposit Account No. 13-3377 under this general authorization.

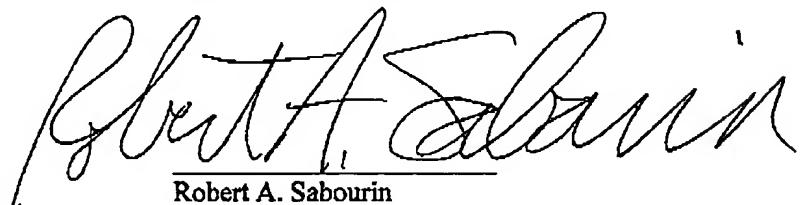
It should be noted that the above arguments are directed towards certain patentable distinctions between the claims and the prior art cited. However, the patentable distinctions between the pending claims and the prior art cited are not necessarily limited to those discussed above.

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In view of the foregoing remarks and amendments, it is respectfully submitted that each rejection of the Office Action has been addressed and overcome so that this application is now in condition for allowance. The Examiner is respectfully requested to reconsider the application, withdraw the rejections and/or objections, and pass the application to issue. Should questions arise during examination, the Examiner is welcome to contact the applicant's attorney as listed below.

Respectfully submitted,



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